

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO,
EASTERN DIVISION**

LARRY D. REID, *et al.*,

Plaintiff,

v.

DARRYL D. MOORE,

Defendant.

) **CASE NO.: 1:21-CV 00991**
)
)
) **MAGISTRATE JUDGE: J. GREENBER**
)
)
)
)
)
)

FILED

MAY 13 2024

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

**DEFENDANT DARRYL D. MOORE,
REPLY TO PLAINTIFF'S ERRONEOUS FIFTH MOTION TO ENFORCE
SETTLEMENT AND REQUEST TO DISMISS PLAINTIFF'S COMPLAINT WITH
PREJUDICE**

NOW Comes, Defendant, Darryl D. Moore, pro se, hereby respectfully moves this honorable Court to enter an Order dismissing Plaintiff's FIFTH Complaint with prejudice based on fraud and lies by the Plaintiff and duress of the Defendant. Plaintiff went into damage control mode and sought mediation with the Defendant to silence his voice. I agreed under duress to sign the agreement. As more fully set forth hereinafter, in that Plaintiff, has alleged the Defendant violated the medication agreement. The Defendant asserts that the Plaintiff has violated the mediation agreement. The Plaintiff's original claims were erroneous and intentionally misleading. As stated, in that the claims asserted by Plaintiff are inadequately supported by unwarranted deductions of fact or unreasonable inferences, this Court should dismiss his FIFTH erroneous claim expeditiously. The reason for this FIFTH Motion are made more evident as the Plaintiff escalates his preposterous, puerile postering asserting that the Defendant is guilty of slander and defamation. Defendant has become aware of new information by a former employer and gay lover of 13 years who was a member of the Plaintiff's inner circle that debunks claims in

the initial filing by Reid against Moore. The Plaintiff asserted that the Defendant falsely accused him of child molestation, having sexually transmitted infections/diseases, falsifying documents to obtain PPP loans, misappropriation of church funds, and a plot to put two bullets in his chest. The Plaintiff should not be allowed to continue whining and whimpering before this honorable Court every time his feelings get hurt by the truth about him being revealed. Furthermore, since the Plaintiff will not cease using his financial means in an attempt to bully or intimidate me, I am left with no other recourse but to make a video for this court to view that lays out exactly what the Plaintiff has been doing from the start. The Plaintiff views the Defendant as low hanging fruit that he can harass at will with the help of his legal team. The Plaintiff seeks to draw this Court into his web of deception, vengeance, and retaliation. The Plaintiff desires to use this Court to harass the Defendant for having the audacity to interview three people that accused him of sexual assault. One of the alleged victims accuses him of infecting him with H.I.V. The Plaintiff was further infuriated because the Defendant requested a copy of his Form 990 for his M.B.N. Network "non-profit". A request that has not been honored. He has been reported to the I.R.S. for non-compliance by several people. The crux of the matter is the Plaintiff wants this Court to shield him from public exposure as it relates to alleged sexual misconduct and theft. Whenever someone creates a video about the Plaintiff, he immediately contacts his legal counsel and falsely claims the Defendant is directly involved. The Plaintiff has made this claim publicly on the social media platform of his employee Davyon Augustus. The Plaintiff fails to realize that he is disliked by a large group of people that were silent about him because of his bullying and intimidation tactics. That is no longer the case. Every day, a new content creator does a podcast about the Plaintiff. He has not sued any of them. After the story of the three accusers, his Caribbean lover who the Plaintiff arranged an illegal marriage to his lesbian cousin with, and the

video by Vincent T. Hill circulated on social media, the Defendant mailed a letter to the court (see attached) requesting that the mediation be thrown out. The “spouse” of the Plaintiff’s cousin is living in Florida with his pregnant girlfriend. The “marriage” was a fraud. A crime was committed.

Furthermore, the Plaintiff, Larry D. Reid who resides (partially) at 35 Mount Paran Road NW, Atlanta, GA 30327 has failed to honor the terms of the mediation agreement. He has failed to compel his employee Davyon Charles Demil Augustus (d.b.a. Consciouz TV) who resides at 5322 Ridgeway Street, Columbia, SC 29203, associate Brian Hugh Henry, II (d.b.a. Knocc Out Media) who resided (before eviction) at 3000 Murworth Drive Apt. 212, Houston, TX 77025, or associate Andrea N. Garrison who resides at 2886 Briggs Ave Apt. 1E, Bronx, NY 10458 to cease making social media content about the Defendant. The Defendant had to obtain a Civil Stalking Protection Order in Cuyahoga County, OH for THREE years (CV-22-964092) against Augustus and Henry. The Plaintiff has sent out a text (see attached) falsely accusing the Defendant of causing him to be fired from the cast of a show titled “Kingdom Business”. Content creators with far larger platforms orchestrated that and were successful in getting him fired.

Lastly, the Plaintiff views the Defendant as ‘low hanging fruit’ that he can “cherry pick” and harass via this honorable Court as he sees fit simply because he has the financial backing of a wealthy mentor (E. Bernard Jordan) and his social media fanbase. The Plaintiff has made no attempt to take legal action against social media personality Tasha K. A reasonable mind would deduce he is avoiding her because she has the financial wherewithal to fight him in court and expose his secrets to her vast audience of over 1.3 million subscribers. The Plaintiff has not sued content creator Sean Davey Way because he has a large following (over 300K), The Official

King Pain (over 50K), Wiley Jackson of The Wiley Show (Over 40k). The list is too massive to enter her. Tasha K and The Official King Pain both interviewed the first accuser of the Plaintiff. Neither has been sued by him. Official King Pain interviewed the soccer player lover (who married the Plaintiff's cousin illegally) as well and still hasn't been sued by Reid.

STATEMENT OF FACTS

- Defendant obtained a signed affidavit (see attached) from Vincent T. Hill where he clearly states... "his accusations against Larry D. Reid on my YouTube video February of 2024 for misappropriation of funds as it relates to the MBN Network were based off firsthand experiences". He also admits to a 13-year sexual relationship with Reid while he was still married to Alisa Dunn. See link for entire podcast:
<https://www.youtube.com/watch?v=mSONMwLKdG4&t=789s>
- The Plaintiff has even gone as far as to make rap videos where he brags about his lavish lifestyle and material possessions in videos titled "Y'all Niggas Ain't On My Level" and "Y.A.T.A.N." which stands for "Y'all Ain't Talking About Nothing". The videos were directed at Defendant and other social media content creatures.
- Plaintiff refuses to supply a copy of his Form 990 for the MBN Network as required by law.
- Plaintiff was accused by three young men who claimed they were violated as minors. One of the accusers states he contracted HIV from Reid. See link for audio evidence:
https://drive.google.com/file/d/1yLrkGcHAIdPuZSI7vhOyLriXP5c6kmmz/view?usp=drive_link
- Plaintiff arranged an illegal marriage (see attached Official copy of the license) between his lesbian cousin Latrice Spencer and one of his lovers (Lester Peltier) who's Visa had

expired. The fraudulent marriage was officiated by the ex-husband of Spencer who is one of Reid's lovers (per Hill video). Reid can be heard on audio telling Vincent T. Hill he offered Spencer money to marry Peltier. Peltier has never lived with his "wife". He lives in Florida with his pregnant girlfriend. See link (starting at the 22-minute mark and stopping at the 28 minute 40 second mark)

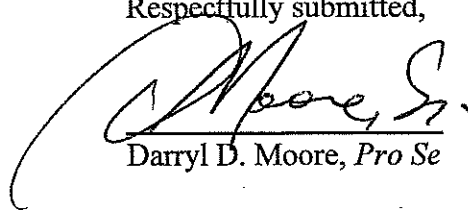
<https://www.youtube.com/watch?v=mSONMwLKdG4&t=789s>

- In interviews with The Official King Pain and Tasha K, Lester Peltier accuses Reid of infecting him with a sexually transmitted disease that he passed on to his pregnant girlfriend. The same Peltier that has been married to Spencer (on paper since September of 2022). <https://youtu.be/IA97sDb6v0g?si=qBjDX33GxIViAxI2>
<https://www.youtube.com/watch?v=iwctUfhRgcs>
- Lester says (On Tasha K Live) Reid paid for gay sex with church donations and he saw the Plaintiff's HIV meds. Stated Reid paid for him to be on Prep medication. He also states Reid refused to get evaluated for STDs with him before having sex. (See attached Chase Bank Zelle payments)
<https://www.tashaklive.com/programs/lester-peltier-nterview-047f10>
- Tasha K interviews the first accuser of Reid (she was not sued)
<https://www.youtube.com/watch?v=vAhOMnEnMVg>
- All of Reid's accuser are male. No female has accused him of anything sexual in nature.
- Reid mentioned me in a (since deleted) video after the mediation as recent as a few weeks ago that was captured by The Official King Pain. <https://vimeo.com/915087961>
- Sent a text message (see attached) claiming I had him fired from BET Television show "Kingdom Business" (see attached)

- Employees and associates threatened the second accuser and some of his family members because he did an interview with The Official King Pain discussing what Reid did to him (see attached)
- The “star witness” against me in this hearing is Davyon Augustus (Conscious TV). There is a pending CSPO violation hearing against him in case CV-22-964092 (see attached)
- Augustus has been arrested for prostitution in Columbia, SC.
- As an employee of Reid, he is bound by the mediation, but he makes videos about me. <https://www.youtube.com/watch?v=P7akSXpm0u4&t=5766s>
- Augustus conspired with Reid, et. al to distribute an altered video where I supposedly plot to shoot Reid in his chest two times. A complaint was made with YouTube. The video was removed but has since been uploaded to YouTube again by Augustus. This is the same person that is supposed to be so credible as Reid’s star witness.
- In May of 2018, Reid sent Augustus a text message saying he will “fuck him in the ass to let him know who runs this bitch” (see attached). This is from a “pastor” to an openly gay man.
- The counsel for the Plaintiff once said in an email about Augustus that “this guy is out of his fucking mind.” (see attachment). So how can he now be a credible witness in the legal matter?
- Augustus once held his former fiancée against his will. After having his phone smashed and clothes destroyed, the person escaped and contacted me. My associates and I purchased food, bought him clothes, got him a hotel room, and purchased a one-way plane ticket to safety. Listen to the link(s) <https://www.youtube.com/watch?v=r-HmFpA4zz0&t=59s> <https://www.youtube.com/watch?v=jMgd0wl-aWU&t=3286s>

- Augustus and Brian Henry II called my former place of employment. I had to obtain a Civil Stalking and Protection Order against them. They also called my elderly mother and recorded her live on YouTube (see attached). They placed my address online, photos of my family, and pictures of my home.
- Subpoenas of Reid's personal and business banking accounts from January 2022 to July of 2023 will show transactions involving Peltier and his cousin Latrice Spencer as it pertains to the arranged marriage.
- Subpoenas of Plaintiff's business contracts and monthly spreadsheets between January 2022 and July of 2023 with Peltier and Spencer will provide proof of compensation and other expenditures involving them.
- Subpoenas of his medical records as it pertains to the diagnosis and treatment of sexually transmitted infections/diseases will prove the claims made by one of the accusers and one of Reid's former lovers about him having STD's.

Respectfully submitted,

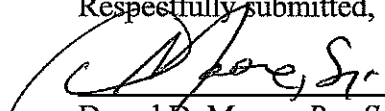


Darryl D. Moore, *Pro Se*

CONCLUSION

Based upon the facts set forth above and for the reasons thereby outlined above, the Defendants' *Motion to Dismiss* with prejudice should be granted.

Respectfully submitted,



Darryl D. Moore, *Pro Se*


CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing *Motion to Dismiss* was made via

USPS mail with sufficient postage attached this __8th__ day of May 2024.

Office of the Clerk
United States District Court
Northern District of Ohio
Carl B. Stokes United States Court House
801 West Superior Avenue
Cleveland, OH 44113-1830

Raymond V. Vasvari, Jr.
Ste. 800
Tower East
20600 Chagrin Blvd
Shaker Heights, OH 44122-5353
216-458-5880
Fax: 216-302-3700
Email: vasvari@vasvarilaw.com



Darryl D. Moore, *Pro Se*